

## **EXHIBIT “A”**

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these pages here, page four of five. I would have never allowed my name to be spelled wrong. I've never seen what we're looking at today.

Q Let's go through it. Take a look at page two of five, the second page.

Is that the magazine you work for currently as the picture is depicted on page two of five at the top?

MR. THOMPSON: Objection.

She said she didn't work for --

Q I'm asking is that the picture of a cover of a magazine you work for?

A Yes.

Q Is that a picture of a cover that was at the newsstands at some point in time?

A It was actually in record stores I believe. I'm not sure of the circulation or the distribution so I cannot speak as to whether it was available on newsstands.

Q The picture that's depicted in page two of five, is that the picture of RAW magazine when you were the Editorial Director?

A This image here, yes.

(Indicating.)

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the conversation you had with Jeremy Miller.

A Jeremy had a book of salary ranges for editorial positions and he would show that book to me to show me that this is what an Executive Editor makes and to show me that I was in the range of Executive Editor or whatever position it was. He showed me what the Editor-in-Chief range was and showed me what other staff ranges were to make me feel comfortable for not being the Editor-in-Chief I guess. I don't know why we did that when it came to me, but we often had conversations about salary range and my duties and the fact that I was doing the job of the Editor-in-Chief.

Q Did you ever express to him that you felt you were being discriminated against?

A Yes.

Q Tell me when you told him that you felt you were being discriminated against.

A I don't recall when I specifically told Jeremy, but there were times in his office when I let him know that Dave and Ray were doing things to me and doing things to Adila

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1  
2 that were inappropriate and he acknowledged  
3 that.

4 Q Did you use the word discrimination  
5 when you spoke to Jeremy?

6 A I don't remember using  
7 discrimination when I spoke to him.

8 Q Did you ever say to him that men  
9 and women are treated differently at The  
10 Source?

11 A In substance, yes.

12 Q What do you mean in substance?

13 A I mean that I may not have used the  
14 exact words that you just said, but I  
15 definitely spoke to Jeremy about the way that  
16 men were treated at The Source and the way that  
17 women were treated at The Source.

18 Q Tell me what you said specifically  
19 as you sit here today.

20 A I don't recall.

21 Q Tell me generally what you recall  
22 of what you said to him.

23 A I don't recall. I know that we had  
24 those conversations.

25 Q This is in the year 2002?

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1  
2 Miller; is that correct?

3 A Those are the people that I know  
4 made more money than me. Now you're asking me  
5 whether they're similarly situated to me?

6 Q Ms. Osorio, I asked you this of you  
7 on the record and it's on the record. I'm  
8 asking you other than these three that you've  
9 identified as similarly situated, are there any  
10 others?

11 A Not to my knowledge. I can't  
12 remember right now because the line of  
13 questioning was just confusing to me with  
14 regard to who made more money than me, who do I  
15 think was similarly situated that made more  
16 money than me, who do I think was similarly  
17 situated. There was just a lot of questions in  
18 that one session that came out.

19 Q I'm going to ask you again.

20 A Okay.

21 Q The similarly situated individuals  
22 you believe earned more money than you, who are  
23 they?

24 A Chris White.

25 Q Who else?

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1  
2 A I believe that Tom Rudd made more  
3 money than me, but he was not similarly  
4 situated because he reported to Chris White so  
5 I was the most senior person on the editorial  
6 staff.

7 Chris White was the most senior  
8 person on the sales staff and Tom Rudd reported  
9 to Chris White so I wouldn't consider Tom Rudd  
10 to be similarly situated. I would consider him  
11 to be under me, not as senior as the position  
12 that I had. On the Sales Department I was  
13 informed that they also got bonuses.

14 Q You did not?

15 A Did not what?

16 Q As Editor-in-Chief you did not get  
17 bonuses?

18 A I got a Christmas bonus once.

19 Q Who else do you believe was  
20 similarly situated to you that made more money  
21 than you?

22 A I don't believe that there was  
23 anyone else that I knew of, but there were  
24 other things like perks, like living allowances  
25 that people who were not similarly situated to

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me got.

Q List for me the individuals you believe were not similarly situated than you and were earning more money than you.

A Tom Rudd. I don't know of anyone else. I can't think of anyone else at this time.

Q Didn't you mention Jeremy Miller before?

A When I mentioned Jeremy Miller it was in response to who made more money than me.

Q He's not similarly situated, correct?

A Technically I reported to him on financial issues.

Q He was a Chief Operating Officer of The Source, correct?

A Yes.

Q So he would be above you, correct?

A Yes.

Q Other than Tom Rudd, are there any individuals that were below you during the time you were Editor-in-Chief that you believe made more money than you?

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1  
2 A Base salary, not that I believe,  
3 but when you couple in sales, bonuses and  
4 things like living allowances then I don't  
5 know. There could be others.

6 Q During the time you worked at The  
7 Source did you ever look at some of these  
8 salaries? Did you ever look at Tom Rudd's  
9 salary?

10 A No.

11 Q Did you ever look at Jeremy  
12 Miller's salary?

13 A I wasn't privy to those records.

14 Q The belief you had that they made  
15 more money than you is based on your  
16 assumption, correct?

17 A It's based on what I heard in the  
18 office.

19 Q It's based on the assumption,  
20 correct?

21 A No, I heard that was the case.

22 Q Who gave you that information?

23 A I don't recall.

24 Q Was it anyone in management that  
25 gave you that information?



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A I don't recall.

Q Did you ever see a document that reflected their salaries during the time you worked at The Source?

A No.

Q I'm going to go back. Is it based on an assumption?

MR. THOMPSON: Objection.

Asked and answered.

A No, I heard that.

Q Is it based on rumor?

A Yes.

Q You mentioned a living allowance. What was the living allowance?

A I had heard that certain people had living allowances.

Q Do you know who they were?

A I knew that Dale Johnson or I heard that Dale Johnson had a living allowance.

Q Anyone else?

A There could be others, but I don't recall. I know that there were other things like clothing allowances that I had heard people had. In particular, Selwyn Hinds had a

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1  
2 clothing allowance. I knew that before I even  
3 took the job of Editor-in-Chief.

4 Q You said that he was a former  
5 Editor-in-Chief, correct?

6 A Before Carlito, yes.

7 Q Do you know if Dale Johnson was  
8 part of the Boston Crew?

9 A I believe him to be, but I don't  
10 know that for a fact.

11 Q Have you identified Dale Johnson as  
12 part of the Boston Crew?

13 A Probably, yes. I'm not sure. I  
14 don't recall, but that's what I believe. I  
15 couldn't tell you whether he's from Boston. I  
16 don't know that.

17 Q Is he friends with Dave and Ray?

18 A Yes.

19 Q Is Selwyn Hinds part of the Boston  
20 Crew?

21 A No.

22 Q Was he friends with Dave and Ray?

23 A No. I believe that they don't even  
24 like Selwyn now.

25 Q At the time he worked at The Source

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1 Q I'm not asking you that. I'm  
2 asking you if you knew her work performance and  
3 you said no.  
4

5 A No, I don't.

6 Q Did she have an editorial job?

7 A No.

8 Q Who else?

9 A I want to say something else about  
10 discrimination and the factual claim. The men  
11 on the staff had a staff barber who was  
12 employed by the company, but women were never  
13 given a beautician or a manicurist or -- this  
14 staff barber was on the mass head of The Source  
15 magazine and was there to cut and give free  
16 haircuts to the men in the company.

17 Q The staff barber, when did that  
18 exist in The Source?

19 A I couldn't tell you dates. It's on  
20 the mass head at a certain period of time and  
21 even after that there was still a staff barber.

22 Q Was it when you arrived at The  
23 Source?

24 A Yes.

25 Q Was it there when you departed The

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1  
2 A Yeah, he -- Ray and Dave had to  
3 approve everything. They wanted to see  
4 everything in the magazine before it went out.  
5 They -- they did that -- they started doing  
6 that with me.

7 Q Didn't they have that same sort of  
8 management style with the other  
9 editors-in-chief?

10 A No, not at all.

11 MS. LE ROUX: Objection.

12 A Not at all.

13 Q How do you know that?

14 A I mean from conversations with  
15 Carlito I can tell you that there were -- there  
16 were things that Carlito would do and they  
17 would -- they would make comments about it  
18 after it was done, but they wouldn't interfere  
19 with the editorial process the way that they  
20 did when I became the editor-in-chief. It  
21 wasn't the same. I mean a lot of people  
22 commented on that or felt the same way, that  
23 things were different with Carlito. Dave and  
24 Ray weren't always involved from Adila to Katie  
25 Shad to Paul, to even Jeremy. They knew that

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1 when Carlito was editor-in-chief when Selwin  
2 was editor-in-chief Dave and Ray were not  
3 involved in as many decisions, editorial  
4 decisions, or in all the editorial decisions  
5 the way they involved themselves when I became  
6 the editor-in-chief.  
7

8 Q But that's your opinion, correct?

9 MS. LE ROUX: Objection.

10 A No, these are conversations that I  
11 had with people in the office.

12 Q These are all their opinion,  
13 though, correct?

14 MS. LE ROUX: Objection.

15 A It's my opinion. It's Carlito's  
16 opinion. It's what Jeremy has said. It's what  
17 Katie Shad has said. It's what Paul has said,  
18 Shire Calabra, Jeremy. Like people have said  
19 things like that in their conversations with me  
20 and I knew from working under Carlito that  
21 there were things that he could do that I  
22 couldn't do. Even Ray would say things like we  
23 would -- this story would have not, you know,  
24 we wouldn't have got this through if it -- if  
25 you were Carlito. This stuff wouldn't be